

**IN THE UNITED STATES BANKRUPTCY COURT FOR
THE EASTERN DISTRICT OF TENNESSEE**

In re:

**DOUGLAS CARL LANKSTER
TIFFANY LEANN LANKSTER**

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**No. 1:17-bk-13003-SDR
Chapter 13**

Debtors

MOTION TO DETERMINE FINAL CURE AND PAYMENT

NOTICE OF OPPORTUNITY TO OBJECT AND FOR HEARING

Notice is hereby given that:

Pursuant to E.D. Tenn. LBR 9013-1(h), the court may consider this matter without further notice or hearing unless a party in interest files an objection. If you object to the relief requested in this paper, you must file with the clerk of the court at the United States Bankruptcy Court, 31 East 11th Street, Chattanooga, TN 37402, an objection within 21 days from the date this motion was filed and serve a copy on the movant's attorney, Charles G. Jenkins, Jr., Swafford, Jenkins & Raines, 32 Courthouse Square, Jasper, TN 37347. If you file and serve an objection within the time permitted, the court will schedule a hearing and you will be notified. If you do not file an objection within the time permitted, the court will consider that you do not oppose the granting of the relief requested in this paper and may grant the relief requested without further notice or hearing.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

The debtors request that the court determine that the default under the residential mortgage loan had been cured as of July 15, 2021, and that all required postpetition amounts due as of that date had been paid, and make the following representations in support of this request:

1. Home Point Financial Corporation is the holder of the residential mortgage loan.

2. On July 15, 2021, the trustee gave the holder the notice required by Fed. R. Bankr. P. 3002.1(f).

3. On August 4, 2021, the holder of the residential mortgage loan filed a response pursuant to Fed. R. Bankr. P. 3002.1(g) indicating that the holder agrees that the debtor(s) had paid in full the amount required to cure the default on its mortgage claim, and that it does not contend that any required cure or postpetition amounts remained unpaid, as of the date stated in the trustee's notice.

/s/Charles G. Jenkins, Jr.
CHARLES G. JENKINS, JR. (014909)
Attorney for Debtors
SWAFFORD, JENKINS & RAINES
32 Courthouse Square
Jasper, TN 37347
(423) 942-3168

CERTIFICATE OF SERVICE

I certify that the foregoing paper was served electronically on the following on August 6, 2021:

Kara L. West
Chapter 12 & 13 Trustee
P.O. Box 511
Chattanooga, TN 37401

United States Trustee
Historic U.S. Courthouse
31 E. Eleventh Street
Fourth Floor
Chattanooga, TN 37402

I further certify that the foregoing paper was served by mail on the following, at the following addresses, on August 6, 2021:

Douglas Carl Lankster
Tiffany Leann Lankster
142 Osceola Drive
Whitwell, TN 37397

Wilson & Associates, P.L.L.C.
320 North Cedar Bluff Road, Suite 240
Knoxville, TN 37923

Home Point Financial Corporation
11511 Luna Road Suite 300
Farmers Branch, TX 75234

Robertson, Anschutz, Schneid, Crane & Partners, PLLC
10700 Abbott's Bridge Rd., Suite 170
Duluth, GA 30097

This the 6th day of August, 2021.

/s/Charles G. Jenkins, Jr.
CHARLES G. JENKINS, JR. (014909)
Attorney for Debtor
SWAFFORD, JENKINS & RAINES
32 Courthouse Square
Jasper, TN 37347
(423) 942-3168